

NO. 49696-8-II

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON
DIVISION TWO

STATE OF WASHINGTON,

Respondent,

v.

GERALD CAYENNE,

Appellant.

ON APPEAL FROM THE SUPERIOR COURT OF THE
STATE OF WASHINGTON FOR GRAYS HARBOR COUNTY

The Honorable David Edwards, Judge

BRIEF OF APPELLANT

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A. ASSIGNMENTS OF ERROR

1. The court's exclusion of relevant evidence bearing on an element of the charged offense violated appellant's right to present a defense.

2. The court abused its discretion in excluding relevant defense evidence.

3. The trial court erred by imposing a sentence that exceeds the five-year statutory maximum for failing to register.

Issues Pertaining to Assignments of Error

1. A person is guilty of failing to register if he or she fails to comply with a requirement of his or her registration. Appellant was charged with failing to register with the Grays Harbor county sheriff's office throughout a two-year period. During that same time period, however, appellant was in and out of custody at the Chehalis Tribal jail and registered with the Chehalis Tribal Public Safety, which is also in Grays Harbor. The defense sought to introduce this evidence to establish appellant did not knowingly fail to comply with his duty to register. Did the court abuse its discretion and violate appellant's right to present a defense by excluding this evidence?

2. Where the combined period of incarceration and community custody exceeds the statutory maximum, should this Court remand for resentencing?

B. STATEMENT OF THE CASE

On July 21, 2016, the Grays Harbor county prosecutor charged appellant Gerald Cayenne with failing to register, allegedly occurring between August 7, 2014 and July 21, 2016. CP 1-3; RCW 9A.44.132(1)(a).

The gist of the state's allegations was that Cayenne was released from Airway Heights Correctional Center on August 3, 2014, and never registered with any Washington State jurisdiction thereafter, although he did register with Chehalis Tribal Public Safety on November 17, 2014. CP 4-6. Upon his release from Airway Heights, however, Cayenne reportedly was directed to report to the Montesano (Grays Harbor) department of corrections (DOC) office. CP 5.

At Cayenne's jury trial on November 1, 2016, the state moved in limine to restrict any testimony regarding Cayenne's registration with the Chehalis Tribal Public Safety. 1RP (morning of 11/1/16 and sentencing on 11/4/16) 3-4. The state complained the evidence was not relevant with respect to Cayenne's reporting

requirements in Grays Harbor. 1RP 3-4. The defense countered the evidence was relevant to whether Cayenne *knowingly* failed to comply with registration requirements.¹ CP 10-11; 1RP 6-7. As the defense argued, the restriction of any such testimony would deny Cayenne his right to present a defense. CP 10-11.

The court excluded the evidence. CP 12. The court reasoned that the state planned to present evidence Cayenne last registered (in a Washington jurisdiction) in 2013 with Grays Harbor county sheriff's department. 1RP 6-7. According to the court, Cayenne therefore knew he was supposed to register in Grays Harbor. 1RP 8. The court also reasoned that substantial compliance is not a defense to failing to register. 1RP 8-9; citing State v. Vanderpool, 99 Wn. App. 709, 995 P.2d 104 (2000).

Leanna Ristow is the Grays Harbor County criminal record and registered sex offender support specialist. RP (trial on 11/1/16) 7. She testified that RCW 9A.44.130 requires anyone convicted of a sex offense to register within three business days following

¹ Under RCW 9A.44.132:

(1) A person commits the crime of failure to register as a sex offender if the person has a duty to register under RCW 9A.44.130 for a felony sex offense and knowingly fails to comply with any of the requirements of RCW 9A.44.130.

Emphasis added.

conviction, release from custody, or move to a new county or area.

RP 9. She testified that whenever a person has a duty to register in Grays Harbor and they either return to the county or move to a new county, he or she is required to report in person to the Grays Harbor sheriff's office and re-register within three days. RP 10-11. If a person has registered with Grays Harbor personally in the past, re-registration can be done by certified mail. RP 11-12.

Although Ristow does not personally assist anyone with the registration process, she claimed to recall a registration for Gerald Cayenne in 2013.² She identified a document pertaining to Cayenne indicating he came in to register on September 30, 2013. RP 13. She testified the document contained Cayenne's name, his date of birth, the date of conviction, the location of the conviction, "the address that he was registered with us," as well as his signature and photo. RP 13. She testified the document appeared to be a true and accurate copy of "a change of address, or annual verification form" kept in the sheriff's office in the regular course of business. RP 13.

Ristow also identified a document pertaining to Cayenne that reportedly informed him of all the registration requirements. RP 14.

She claimed Cayenne initialed various paragraphs and signed and dated it at the bottom. RP 15. Ristow testified the document appeared to be a true and accurate registration notification kept in the regular course of business. RP 15. Again, however, Ristow did not personally assist Cayenne with the paperwork. RP 18.

Ristow testified Cayenne left the county in 2014. RP 16. DOC subsequently notified Ristow Cayenne was returning to the area and his supervision was being transferred back to Grays Harbor. RP 17. According to Ristow, Cayenne did not re-register, however. RP 14, 17.

Damon Brown is a community corrections officer (CCO) with DOC. RP 19. Brown testified he was assigned to supervise Cayenne beginning around August third, 2014. RP 21-22. Brown testified that Cayenne was scheduled to return to Grays Harbor on August 3, 2014 and was supposed to report to Brown's office within one business day on August 4, 2014. RP 22.

Brown testified he was away for the weekend, however, and posted the key to Cayenne's DOC housing to the inside of the door. RP 22. Brown claimed that when he returned on Tuesday, August

² Cayenne stipulated he had a prior conviction requiring him to register. 1RP 12; RP 27-28.

fifth, the key was still there. RP 23. Brown contacted Cayenne's sister and located Cayenne at her trailer. RP 23.

A few days later, Brown contacted "Miss Randolph" to check on Cayenne's registration status. She reportedly indicated he had not registered. RP 23.

According to Brown, Cayenne was arrested in the deli at the Lucky Eagle Casino and was taken to the Chehalis tribal jail. RP 24. At the time of arrest, Cayenne reportedly said he lived in Lewis county. RP 24. Brown testified he contacted Lewis county sheriff's office but there was no indication Cayenne was registered there. RP 24.

Brown testified there is a CCO that meets with people at the Chehalis tribal jail. According to Brown: "There is a CCO that is responsible for conducting report days in that particular jail, I do believe it's twice a month." RP 27. As Brown further explained: "It's done as a courtesy, given the fact that this is a very rural county, and to come from Oakville to Montesano can sometimes be a big deal for folks that don't have cars, or access to transportation." RP 27.

Cayenne testified he can read and write but that he has suffered head injuries that impact his ability to read and

comprehend. RP 29. He remembered registering in 2013 with the Grays Harbor sheriff. He also remembered initialing each of the paragraphs in the document identified by Ristow. RP 30. However, Cayenne testified he was asked to read the paragraphs to himself, and he did not have his glasses. As a result, the requirements were a "blur" that Cayenne did not really read but just initialed as directed. RP 31.

In addition, he testified: "when you go where I came from and back out, you know, and they don't re-tell you, and you have been somewhere else[.]" RP 32. As Cayenne testified, the registration requirements have also changed over the years, which added to the confusion. RP 32.

In closing argument, the prosecutor argued Cayenne was guilty because he returned to Grays Harbor in 2014 and never re-registered:

Also, the testimony of Miss Ristow and CCO Brown, they told you that the defendant came back into Grays Harbor County in 2014, and specifically on August third, 2014. Again, Ms. Ristow's testimony was talking about how there is this three-day grace period, which is why the date starts on the 7th, 2014, they both testified that he didn't register in Grays Harbor County during that entire two-year period.

RP 37.

The prosecutor further argued that the only real issue in the case was whether Cayenne knowingly failed to comply with registration requirements. RP 37. She argued that element was proved because Cayenne properly registered in 2013. RP 37. The jury convicted Cayenne. CP 20.

In her sentencing memorandum, defense counsel expanded on Cayenne's tribal registration process:

Over the almost two years that the state charged Mr. Cayenne with failing to register he has been in and out of custody numerous times. He was held out at the Chehalis Tribal Jail. Each time he was released from custody, he has indicated that the jail staff and/or a Chehalis probation officer has assisted him in the registration process. He believed that that was the only registration he needed to do. Unfortunately for Mr. Cayenne, this registration that was done only complied with his requirement to register with the Chehalis Tribe. Because they are a separate jurisdiction, he was actually required to register both at the tribe and in the county where he was residing, which was Grays Harbor County.

Although DOC officer Brown testified that he did not meet Mr. Cayenne while he was on his caseload, Mr. Cayenne had been checking in with DOC. There is a curtesy [sic] DOC officer that goes to Chehalis to meet with offenders. Mr. Cayenne had met with that person out at the tribe, and states that they did not tell him of any problems with registration.

CP 22-23; see also 1RP 24-25.

During allocution, Cayenne also explained:

The only thing I have to say was that – like I said, it was a confusing matter that I – reporting with, you know, pictures and photos, nice pieces of paper many times at the trial. So I assumed this was the same, because I was in violation by DOC and DOC was right there – right around me and – in tribal jail. So I assumed it must have been okay, otherwise they should have said something to me, that I better either come down here, turn myself in or check this out, because this is not panning out.

1RP 25.

The court imposed a mid-standard range sentence of 50 months. 1RP 29. The court also imposed 36 months of community custody. CP 24-38. This appeal follows. CP 41.

B. ARGUMENT

1. THE COURT ERRED IN EXCLUDING RELEVANT DEFENSE EVIDENCE.

The Sixth³ and Fourteenth⁴ Amendments, as well as article 1, § 2⁵ of the Washington Constitution, guarantee the right to trial by jury and to defend against the state's allegations. These

³ The Sixth Amendment provides:

In all criminal prosecutions, the accused shall enjoy the right to a speedy and public trial, by an impartial jury of the State and district wherein the crime shall have been committed . . . and to be informed of the nature and cause of the accusation; to be confronted with the witnesses against him; to have compulsory process for obtaining witnesses in his favor, and to have the Assistance of Counsel for his defense.

⁴ The Fourteenth Amendment provides, in pertinent part, "[N]or shall any State deprive any person of life, liberty, or property, without due process of law."

guarantees provide criminal defendants a meaningful opportunity to present a complete defense, a fundamental element of due process. Chambers v. Mississippi, 410 U.S. 284, 294, 93 S. Ct. 1038, 35 L. Ed. 2d 297 (1973); Washington v. Texas, 388 U.S. 14, 19, 87 S. Ct. 1920, 18 L. Ed. 2d 1019 (1967); State v. Burri, 87 Wn.2d 175, 181, 550 P.2d 507 (1976).

Absent a compelling justification, excluding exculpatory evidence deprives a defendant of the fundamental right to put the prosecutor's case to the crucible of meaningful adversarial testing. Crane v. Kentucky, 476 U.S. 683, 689- 690, 106 S. Ct. 2142, 90 L. Ed. 2d 636 (1986) (quoting United States v. Cronin, 466 U.S. 648, 656, 104 S. Ct. 2039, 80 L. Ed. 2d 657 (1984)).

In Washington, State v. Hudlow, 99 Wn.2d 1, 659 P.2d 514 (1983) and State v. Darden, 145 Wn.2d 612, 41 P.3d 1189 (2002), define the scope of a criminal defendant's right to present evidence in his defense. A defendant must be permitted to present even minimally relevant evidence unless the state can demonstrate a compelling interest for its exclusion. No state interest is sufficiently compelling to preclude evidence of high probative value. Darden,

⁵ Article 1, § 21 provides, "The right of trial by jury shall remain inviolate."

145 Wn. 2d at 621-22; Hudlow, 99 Wn.2d at 16; State v. Reed, 101 Wn. App. 704, 714- 15, 6 P.3d 43 (2000).

Relevant evidence is evidence that tends to "make the existence of any fact that is of consequence to the determination of the action more or less probable than it would be without the evidence." State v. Stenson, 132 Wash.2d 668, 701-02, 940 P.2d 1239 (1997), cert. denied, 523 U.S. 1008, 118 S.Ct. 1193, 140 L.Ed.2d 323 (1998); ER 401. Under this definition, evidence is relevant if (1) it has a tendency to prove or disprove a fact (probative value), and (2) that fact is of consequence in the context of the other facts and the applicable substantive law (materiality). 5 Karl B. Tegland, Washington Practice, Evidence sec. 82, at 227 (1989); State v. Rice, 48 Wn. App. 7, 12, 737 P.2d 726 (1987); Davidson v. Municipality of Metro. Seattle, 43 Wn. App. 569, 573, 719 P.2d 569 (1986).

To have probative value, evidence need only have minimal logical relevance. Tegland, sec. 83, at 229; Davidson, 43 Wn. App. at 573, 719 P.2d 569. To be material, the evidence must tend to prove or disprove a fact "of consequence to the determination of the action." Tegland, sec. 83, at 231; Davidson, 43 Wash.App. at 573, 719 P.2d 569 (emphasis omitted) (quoting ER 401). The

relevancy of evidence in a given case will depend on the circumstances of that case and the relationship of the facts to the ultimate issue. Rice, 48 Wn. App. at 12; Davidson, 43 Wn. App. at 573. Relevant evidence tends to establish a party's theory of the case. Rice, 48 Wn. App. at 12.

Under RCW 9A.44.132:

(1) A person commits the crime of failure to register as a sex offender if the person has a duty to register under RCW 9A.44.130 for a felony sex offense and knowingly fails to comply with any of the requirements of RCW 9A.44.130.

Emphasis added.

Here, the jury was instructed:

A person knows or acts knowingly or with knowledge with respect to a fact, circumstance, or result when he or she is aware of that fact, circumstance, or result. It is not necessary that the person know that the fact, circumstance, or result is defined by law as being unlawful or an element of a crime.

If a person has information that would lead to a reasonable person in the same situation to believe that a fact exists, the jury is permitted but not required to find that he or she acted with knowledge of that fact.

CP 16; RCW 9A.08.010(1)(b)(i).

As the prosecutor recognized in closing argument, the key issue in the case was whether Cayenne knowingly failed to comply

with registration requirements. Therefore, Cayenne's knowledge was a matter of consequence to the determination of the action. Thus, the only question is whether Cayenne's registration with the Chehalis Tribal Public Safety – which is also in Grays Harbor (Oakville) – tends to disprove the state's allegation Cayenne knew he was failing to comply with registration requirements. The answer is yes.

First, CCO Brown testified DOC sends one of its officers "as a courtesy" to Chehalis Tribal jail to facilitate report dates because "to come from Oakville to Montesano can sometimes be a big deal for folks that don't have cars, or access to transportation." RP 27. Second, as defense counsel explained at sentencing, Cayenne had been in and out of jail, held at the Chehalis Tribal jail, throughout the two-year charging period. Every time he was released, the jail staff or a Chehalis probation officer helped him with the registration process. CP 22-23. And third, Cayenne stated that due to the DOC courtesy officer's presence at the tribal jail, and the fact the officer never alerted him he needed to do something different, Cayenne presumed his registration with the tribe was sufficient. 1RP 25. All of this tends to establish Cayenne did not know he was failing to comply with registration requirements. Therefore, the

evidence was material and Cayenne was entitled to present it as part of his defense.

The trial court's decision to admit or exclude evidence is reviewed for abuse of discretion. State v. Franklin, 180 Wash.2d 371, 377 n. 2, 325 P.3d 159 (2014); State v. Strizheus, 163 Wash.App. 820, 829, 262 P.3d 100 (2011), review denied, 173 Wash.2d 1030, 274 P.3d 374 (2012). "An erroneous evidentiary ruling that violates the defendant's constitutional rights, however, is presumed prejudicial unless the State can show the error was harmless beyond a reasonable doubt." Franklin, 180 Wash.2d at 377 n. 2, 325 P.3d 159.

The court abused its discretion in excluding the tribal registration evidence as it was probative and material. A Trial court abuses its discretion if its decision is manifestly unreasonable or based on untenable grounds or untenable reasons. In re Marriage of Littlefield, 133 Wash. 2d 39, 940 P.2d 1362 (1997). In excluding the tribal registration evidence, the court reasoned that Cayenne knew what his reporting requirements were by virtue of his proper registration in 2013. However, that should have been a question for the jury, not the court. Significantly, Cayenne testified that "when you go where I came from and back out, you know, and they

don't re-tell you, and you have been somewhere else[.]” RP 32. Accordingly, Cayenne's registration in 2013 did not necessarily prove what he thought – or knew – was required of him over a year later after being released from the tribal jail and being assisted with the registration process there.

Similarly unreasonable was the court's decision to exclude the evidence on grounds substantial compliance is not a defense to failure to register. Regardless of substantial compliance, the lack of knowledge is a defense. In fact, that was Cayenne's theory of the case. And it would have been a lot stronger had he been allowed to present the tribal registration evidence. As such, the court's evidentiary error was not only manifestly unreasonable, but it also violated Cayenne's right to present a defense.

The state therefore must show the error was harmless beyond a reasonable doubt. But even under the standard for evidentiary error, Cayenne is entitled to reversal. Evidentiary error which is not of constitutional magnitude requires reversal if the error, within reasonable probability, materially affected the outcome. State v. Halstien, 122 Wash.2d 109, 127, 857 P.2d 270 (1993). There is a reasonable probability the court's exclusion of the tribal registration evidence materially affected the outcome. It

would be unreasonable for any juror to conclude Cayenne did not know he at least had some form of reporting requirement. However, given the overlapping jurisdictions of the tribe and the county – both in Grays Harbor – it would be reasonable for a juror to conclude Cayenne did not realize that by only reporting with the tribe, he was violating his registration requirements. This Court therefore should reverse Cayenne's conviction.

2. THE COURT ERRED IN FAILING TO ENSURE THE SENTENCE DOES NOT EXCEED THE FIVE-YEAR STATUTORY MAXIMUM.

Cayenne's failing to register offense constitutes a Class C felony, with a maximum sentence term of five years. CP 24, 26; RCW 9A.44.132(1)(a)(ii). The court imposed a sentence of 50 months of incarceration and 36 months of community custody. CP 27. This exceeds the statutory maximum.

Under prior statutes, the Department of Corrections was allowed to recalculate community custody terms to ensure the combination of confinement and community custody did not exceed the statutory maximum. See State v. Franklin, 172 Wn.2d 831, 263 P.3d 585 (2011) (accord, In re Restraint of Brooks, 166 Wn.2d 664, 211 P.3d 1023 (2009)). But the legislature amended the pertinent

statute in 2009,⁶ and in 2012 the Supreme Court made it clear that sentencing courts, not the Department of Corrections, must reduce the community custody term to ensure the combination does not exceed the statutory maximum. Boyd, 174 Wn.2d at 473 (citing RCW 9.94A.701(9)). The proper remedy is to remand to the trial court to specify sentence terms that do not exceed the statutory maximum. Boyd, 174 Wn.2d at 473; State v. Land, 172 Wn. App. 593, 603, 295 P.3d 782, review denied, 177 Wn.2d 1016 (2013).

D. CONCLUSION

Because the court's exclusion of relevant defense evidence constituted a manifest abuse of discretion and violated Cayenne's right to present a defense, this Court should reverse his conviction. Alternatively, this Court should remand for resentencing because

⁶ The controlling statute provides,

The term of community custody specified by this section shall be reduced by the court whenever an offender's standard range term of confinement in combination with the term of community custody exceeds the statutory maximum for the crime as provided in RCW 9A.20.021.

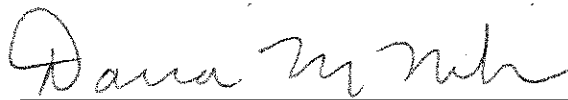
RCW 9.94A.701(9) (emphasis added) (effective July 26, 2009. Laws of 2009, ch. 375, § 5). For defendants who were sentenced after this statute became effective, the trial court is required to reduce the term of community custody to ensure that the total sentence is within the statutory maximum, and not the Department of Corrections. State v. Boyd, 174 Wn.2d 470, 473, 275 P.3d 321 (2012).

the combined period of incarceration and community custody exceeds the statutory maximum.

Dated this 7th day of July, 2017

Respectfully submitted

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A handwritten signature in cursive script, appearing to read "Dana M. Nelson", written over a horizontal line.

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